

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SBI CRYPTO CO., LTD.,

Plaintiff,

v.

WHINSTONE US, INC.,

Defendant.

Civil Action No. 6:23-cv-252-ADA-JCM

**NOTICE OF DEPOSITION OF PHILLIP ISAAK**

TO: Phillip Isaak, by and through his attorney of record, Joshua M. Sandler, Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, [jsandler@winstead.com](mailto:jsandler@winstead.com).

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, counsel of record for Defendant Whinstone US, Inc. (“Whinstone”) will take the deposition by oral examination, under oath before a duly authorized notary public or other officer authorized to administer oaths, of Phillip Isaak on **Thursday, July 31, 2025, beginning at 9:00 a.m.** The deposition will be taken at the offices of Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, will be recorded by stenographic and audiovisual means, and will continue day to day until complete.

DATED: July 11, 2025

Respectfully submitted,

/s/ Robert T. Slovak

Robert T. Slovak (TX 24013523)

[rslovak@foley.com](mailto:rslovak@foley.com)

Brandon C. Marx (TX 24098046)

[bmarx@foley.com](mailto:bmarx@foley.com)

**FOLEY & LARDNER LLP**

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000

Facsimile: (214) 999-4667

**COUNSEL FOR WHINSTONE US, INC**

**CERTIFICATE OF SERVICE**

I certify that, on July 11, 2025, a true and correct copy of the foregoing was served via electronic mail to all counsel of record.

/s/ Brandon C. Marx

Brandon C. Marx

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SBI CRYPTO CO., LTD.,

Plaintiff,

v.

WHINSTONE US, INC.,

Defendant.

Civil Action No. 6:23-cv-252-ADA-JCM

**NOTICE OF DEPOSITION OF CHARLES BYERS**

TO: Charles Byers, by and through his attorney of record, Joshua M. Sandler, Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, [jsandler@winstead.com](mailto:jsandler@winstead.com).

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, counsel of record for Defendant Whinstone US, Inc. (“Whinstone”) will take the deposition by oral examination, under oath before a duly authorized notary public or other officer authorized to administer oaths, of Charles Byers on **Wednesday, August 20, 2025, beginning at 9:00 a.m.** The deposition will be taken at the offices of Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, will be recorded by stenographic and audiovisual means, and will continue day to day until complete.

DATED: July 11, 2025

Respectfully submitted,

/s/ Robert T. Slovak

Robert T. Slovak (TX 24013523)

[rslovak@foley.com](mailto:rslovak@foley.com)

Brandon C. Marx (TX 24098046)

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**COUNSEL FOR WHINSTONE US, INC**

**CERTIFICATE OF SERVICE**

I certify that, on July 11, 2025, a true and correct copy of the foregoing was served via electronic mail to all counsel of record.

/s/ Brandon C. Marx

Brandon C. Marx

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SBI CRYPTO CO., LTD.,

Plaintiff,

v.

WHINSTONE US, INC.,

Defendant.

Civil Action No. 6:23-cv-252-ADA-JCM

**NOTICE OF DEPOSITION OF MICHAEL SCHULER**

TO: Michael Schuler, by and through his attorney of record, Joshua M. Sandler, Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, [jsandler@winstead.com](mailto:jsandler@winstead.com).

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, counsel of record for Defendant Whinstone US, Inc. (“Whinstone”) will take the deposition by oral examination, under oath before a duly authorized notary public or other officer authorized to administer oaths, of Michael Schuler on **Friday, August 22, 2025, beginning at 9:00 a.m.** The deposition will be taken at the offices of Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, will be recorded by stenographic and audiovisual means, and will continue day to day until complete.

DATED: July 11, 2025

Respectfully submitted,

/s/ Robert T. Slovak

Robert T. Slovak (TX 24013523)

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Brandon C. Marx (TX 24098046)

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**COUNSEL FOR WHINSTONE US, INC**

**CERTIFICATE OF SERVICE**

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/s/ Brandon C. Marx

Brandon C. Marx

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SBI CRYPTO CO., LTD.,

Plaintiff,

v.

WHINSTONE US, INC.,

Defendant.

Civil Action No. 6:23-cv-252-ADA-JCM

**NOTICE OF DEPOSITION OF DR. RANDALL VALENTINE**

TO: Dr. Randall Valentine, by and through his attorney of record, Joshua M. Sandler, Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, [jsandler@winstead.com](mailto:jsandler@winstead.com).

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, counsel of record for Defendant Whinstone US, Inc. (“Whinstone”) will take the deposition by oral examination, under oath before a duly authorized notary public or other officer authorized to administer oaths, of Michael Schuler on **Tuesday, August 26, 2025, beginning at 9:00 a.m.** The deposition will be taken at the offices of Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, will be recorded by stenographic and audiovisual means, and will continue day to day until complete.



DATED: July 11, 2025

Respectfully submitted,

/s/ Robert T. Slovak

Robert T. Slovak (TX 24013523)

[rslovak@foley.com](mailto:rslovak@foley.com)

Brandon C. Marx (TX 24098046)

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**COUNSEL FOR WHINSTONE US, INC**

**CERTIFICATE OF SERVICE**

I certify that, on July 11, 2025, a true and correct copy of the foregoing was served via electronic mail to all counsel of record.

/s/ Brandon C. Marx

Brandon C. Marx